

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

BRANDON SMIETANA and )  
 SKYCOIN GLOBAL FOUNDATION LIMITED, )  
 a Singapore company, and SYMBOLIC )  
 ANALYTICS INC. a Delaware Corporation )

Plaintiffs,

Case No. 1:22-cv-00708

V.

Honorable Sara L. Ellis

BRADFORD STEPHENS,  
AARON KUNSTMAN,  
HARRISON GEVIRTZ, f/k/a “HaRRo”,  
RYAN EAGLE,  
FAR AHEAD MARKETING, LLC.,  
JOEL WAYNE CUTHRIELL f/k/a “JOEL”,  
MORGEN PECK, CATHERINE BYERLY,  
STEVEN LEONARD, JOSHUA OGLE,  
AMERICAN PUBLISHERS, INC. d/b/a  
CONDÉ NAST, AMERICAN  
PUBLISHERS, INC. d/b/a CONDÉ NAST d/b/a  
THE NEW YORKER MAGAZINE, and  
UNKNOWN INDIVIDUALS AND COMPANIES

Defendants.

**PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE  
RESPONSE TO DEFENDANT BRADFORD STEPHENS' MOTION TO DISMISS  
PLAINTIFFS' THIRD AMENDED COMPLAINT**

NOW COME the Plaintiffs, BRANDON SMITANA, SKYCOIN GLOBAL FOUNDATION, LIMITED, a Singapore Company, and SYMBOLIC ANALYTICS, INC., a Delaware Corporation, by and through their attorneys, Michael C. Goode & Company and Barney & Karamanis, LLP, and respectfully request that this Honorable Court grant Plaintiffs' Motion for Extension of time to file Response to Defendant Bradford Stephens' Motion to Dismiss Plaintiffs' Third Amended Complaint. In support of this Motion, Plaintiffs state as follows:

1. On July 8, 2023, Plaintiffs filed their Third Amended Complaint. (Dkt. No. 100).
2. Defendant, Bradford Stephens, filed his Motion to Dismiss Plaintiffs' Third Amended Complaint under Federal Rule of Civil Procedure 12(b)(6) and 12(b)(1) (the "Motion to Dismiss") on October 20, 2023 (Dkt. No. 105).
3. Plaintiffs' response to the Motion to Dismiss is due to be filed with the Court on November 20, 2023.
4. Due to numerous personnel changes within Plaintiffs' counsel's office and other unexpected circumstances, Plaintiffs' counsel requires additional time to finalize and file Plaintiffs' response to the Motion to Dismiss.
5. On November 20, 2023, Plaintiffs' counsel contacted counsel for the above-named Defendants, requesting a twenty-one (21) day extension of time to file Plaintiffs' response to Motion to Dismiss.
6. Counsel for Defendants do not object to the extension requested.
7. Plaintiffs respectfully ask this Court to grant a twenty-one (21) day extension for Plaintiffs to file their Response to Defendant Stephens' Motion to Dismiss.

DATED: November 20, 2023

Respectfully submitted,

/s/James A. Karamanis  
Attorney for Plaintiffs

James A. Karamanis  
BARNEY & KARAMANIS, LLP  
Two Prudential Plaza  
180 N. Stetson, Suite 3050  
Chicago, Illinois 60601  
Tel.: (312) 553-5300  
[james@bkchicagolaw.com](mailto:james@bkchicagolaw.com)